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## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DAVID GOLDSTINE,

Plaintiff,

FEDEX FREIGHT, INC., a Washington State entity; "DOE(S) 1-100", employees **FEDEX** FREIGHT. INC.: and CORPORATION(S) XYZ 1-100,

Defendants.

Case No. 2:18-cv-01164 MJP

AMENDED STIPULATED MOTION & PROPOSED SCHEDULING **ORDER** 

NOTE ON MOTION CALENDAR: February 11, 2020

The parties, by and through their respective counsel of record, hereby submit this amended Stipulated Motion & Scheduling Order signed by the Court on January 3, 2020 (Dkt 152). The parties have been communicating in good faith regarding the exchange of benefitsrelated documents and scheduling a settlement conference as ordered by the court. The parties are seeking to modify the remaining deadlines to reflect short continuances to allow the parties to fully comply with the Court's order.

	Original Dates	Amended Dates (in red)
Completion of 30(b)(6) deposition		
regarding benefits at Defendant's expense.	February 14, 2020	March 2, 2020
Plaintiff's expert to issue final revised		
report (if any).	February 28, 2020	March 16, 2020

Defendant's rebuttal expert (if any) to issue preliminary expert report.	February 28, 2020	March 16, 2020
Deadline to supplement Plaintiff's evidence		
with information regarding his medical treatment.	February 28, 2020	February 28, 2020
Completion of deposition of Plaintiff's	-	
expert at Defendant's expense	March 13, 2020	March 25, 2020
Defendant's rebuttal expert (if any) to issue		
final expert report.	March 13, 2020	March 25, 2020
Completion of deposition of Defendant's		
rebuttal expert (if any).	March 27, 2020	April 10, 2020
Deadline to complete deposition of Plaintiff		
regarding his medical treatment.	April 1, 2020	April 1, 2020
	April 27, 2020 at	
	9:00 AM in	April 27, 2020 at 9:00
JURY TRIAL DATE (six days)	Courtroom 14206	AM in Courtroom 14206

STIPULATED & AGREED this \_\_\_\_ day of February, 2020.

AKW LAW, P.C.

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/s/ Ada K. Wong

14 Ada K. Wong, WSBA #45936

Jordan T. Wada, WSBA #54937

Attorneys for Plaintiff

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**BLOOM LAW PLLC** 

/s/ Beth Bloom

Beth Bloom, WSBA # 31702

Attorney for Plaintiff

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AMENDED STIPULATED MOTION & PROPOSED SCHEDULING ORDER - 2

Case No. 2:18-cv-01164-MJP

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12	FEDEX FREIGHT, INC.
13	/s/ Sandra C. Isom
14	Donald H. Snook, Pro Hac Vice Sandra C. Isom, Pro Hac Vice
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Case No. 2:18-cv-01164-MJP

1 **ORDER** 2 IT IS SO ORDERED this 18th day of February, 2020. 3 4 Marshy Helens 5 Marsha J. Pechman 6 United States Senior District Judge 7 8 9 Presented By: 10 AKW LAW, P.C. 11 /s/ Ada K. Wong\_ 12 Ada K. Wong, WSBA #45936 Jordan T. Wada, WSBA #54937 13 Attorneys for Plaintiff 6100 219th St. SW, Suite 480 14 Mountlake Terrace, WA 98043 Tel.: (206) 259-1259 15 Fax: (855) 925-9529 E-mail: ada@akw-law.com 16 E-mail: jordan@akw-law.com 17 **BLOOM LAW PLLC** 18 19 /s/ Beth Bloom Beth Bloom, WSBA #31702 20 Attorney for Plaintiff 3827C S Edmunds St 21 Seattle, WA 98118-1729 Telephone: (206) 323-0409 22 Email: bbloom@bloomlawpllc.com

1	KARR TUTTLE CAMPBELL
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11	/s/ Sandra C. Isom Donald H. Snook, Pro Hac Vice
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## **CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2020, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

5	Medora Marisseau	
	Brett A. Elliot	
6	Karr Tuttle Campbell	
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16	E-mail: <u>bbloom@bloomlawpllc.com</u>	
	Co-counsel for Plaintiff David Goldstine	
17		

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated February 18, 2020, at Mountlake Terrace, Washington.

/s/ Kaila A. Eckert
Kaila A. Eckert, Paralegal

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